

New Hampshire Regional Haze SIP Revision Responses to Federal Land Managers' Comments

On December 20, 2010, the New Hampshire Department of Environmental Services (NHDES) received written comments from the U.S. Department of the Interior, National Park Service (NPS) regarding the November 19, 2010, draft final revision of New Hampshire's Regional Haze SIP. These comments were provide in consultation with the U.S. Fish and Wildlife Service and were in response to the revised Best Available Retrofit Technology (BART) determination for PSNH Merrimack Station Unit MK2. The following is NHDES's response to NPS's comments. **Comments are reproduced in *italics* and the response appears in regular font.**

NPS Comments: We disagree with the methods used by NHDES to demonstrate the visibility response to BART controls at PSNH Merrimack Station. In the CALPUFF model, natural background visibility conditions are to be used to evaluate the visibility impacts from the BART source at Class I receptors. Natural background visibility conditions are to be used with current emissions from the source and again when comparing visibility benefits of alternative emissions control options. The Federal Land Managers (FLMs) have recommended to the northeastern states that since only one year of meteorological data is being modeled, the 20% best natural background visibility conditions should be used in the analysis. The maximum impact value at the Class I area receptors should be used to determine the visibility impact of the source before control and assuming control installation. If three years of meteorological data are processed with observational data, the FLMs have recommended that the annual average of the natural background visibility conditions can be used in the comparison with the 8th highest impact value in each year to determine the source's visibility impact. NHDES has incorrectly used the 20% worst days from current visibility conditions to evaluate the benefits of controls at Merrimack Station. Instead, the 20% best natural background visibility condition and the maximum visibility impact on any day should be used to evaluate the benefits of controls. NHDES' approach is not appropriate and does not meet the BART modeling guidance. Since the maximum impact of the source may actually be on a good visibility day, and since the objective is to compare the source impact to clean natural background visibility conditions, the analysis of the visibility impact of controls at Merrimack Station is not acceptable and needs to be redone.

- **NHDES Response:** In the current revision of the SIP, NHDES has addressed the technical issues raised by NPS, which arose from a misinterpretation of the guidance by NHDES. Please refer to "New Hampshire Regional Haze SIP Revision, Responses to EPA's Comments." In particular, please see the CALPUFF Modeling Assessment, included as an attachment to that response document.